**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PUBLIC CITIZEN, *et al.*,
 	
    Plaintiffs,
 	
    v.
 	
ELISABETH DEVOS, Secretary, U.S. Department of Education, *et al.*,
 	
    Defendants.
	Civil Action No. 1:19-cv-986-RDM

PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Plaintiffs Public Citizen and David Halperin brought this action seeking declaratory and injunctive relief against defendants Elisabeth DeVos and the Department of Education (collectively, the Department) for blocking Public Citizen's website, in violation of the First Amendment and the Administrative Procedure Act. After plaintiffs moved for a preliminary injunction, the Department voluntarily ceased blocking Public Citizen's website and then moved to dismiss the case as moot. Because, as a general rule, a defendant cannot moot a live controversy by voluntarily ceasing the conduct that is the subject of the lawsuit, the Department's motion should be denied.

BACKGROUND

Plaintiffs brought this action after learning that the Department's internal and guest Wi-Fi networks blocked users' access to Public Citizen's website, citizen.org. Users seeking access to that website instead received a message that access to "URL: www.citizen.org/" is "in violation of your Internet usage policy," and that Public Citizen's URL falls within "Category: Advocacy Organization." ECF-1 (Compl.) ¶¶ 14, 16. The complaint sought declaratory and injunctive relief

on the grounds that the Department's action blocking Public Citizen's website violated the First

Amendment and the Administrative Procedure Act. *Id.* ¶¶ 25-35.

After plaintiffs moved for a preliminary injunction, the Department filed a declaration from

its Chief Information Security Officer Steven Hernandez. *See* ECF 16-2 (First Hernandez Decl.).

The declaration states that the Department had "submitted a request to its vendor to grant access

to Public Citizen's website" and that Public Citizen's website was accessible on the Department's

networks as of June 6, 2019. *Id*. ¶¶ 4, 5. It also represents that the "Department will not take any

action to block access to Public Citizen's website through its internal and guest-WiFi networks,"

unless the site poses a threat to the Department's networks. *Id.* ¶ 6.

In a second declaration submitted with the Department's motion to dismiss, Mr. Hernandez

set forth the Department's explanation of why Public Citizen's website was blocked. *See* ECF 19-

2 (Second Hernandez Decl.). According to Mr. Hernandez, in or about 2017, the Department began

using a company called Fortinet to meet "cyber security and web filtering service requirements,"

through a service called FortiGuard Web Filtering. *Id.* ¶ 5. Mr. Hernandez explains that Fortinet

uses "proprietary software" to classify web pages into six categories, including "Adult/Mature

Content." *Id.* ¶¶ 7, 8 & Exh. 1. The Adult/Mature Content category contains subcategories such as

"Alternative Beliefs," "Dating," "Gambling," "Nudity and Risque," "Pornography," "Sports

Hunting and War Games," and "Weapons (Sales)," but also "Abortion" (covering sites with data,

legal discussion, and other information about abortion), "Sex Education" (covering sites with

educatonal materials about sex and sexuality), and, relevant here, "Advocacy Organizations." *Id.*;

Exh. A to Declaration of Nandan M. Joshi (Joshi Decl.), attached hereto. According to Fortinet's

website, the Advocacy Organizations subcategory includes "organizations that campaign or lobby

for a cause by building public awareness, raising support, influencing public policy, etc." *See* Exh. A, p.1 to Joshi Decl.

Mr. Hernandez states that the "operation of FortiGuard's proprietary filtering system" placed Public Citizen's website in the Advocacy Organizations subcategory. Second Hernandez Decl. ¶ 10. The FortiGuard system "allows the customer" to allow, block, or take other actions with respect to categories and subcategories. *Id*. ¶ 9. The Department, "as a customer," elected to block the Adult/Mature Content category, including all of its subcategories. *Id.* As a result, the Department blocked websites subcategorized under Advocacy Organization, including Public Citizen's website. *Id.* ¶¶ 9, 10.

Fortinet provides two ways of overriding its web filtering system. *Id*. ¶ 13. The first method involves changing the category to which the website is assigned. *Id.* The second method is called "administrative override or allow blocked override." *Id.* According to Fortinet's website, this second override method is "not indefinite": the "longest that an override can be enabled is for 1 year less a minute." Exh. B, p.4 to Joshi Decl. To stop the Department's blocking of Public Citizen's website, Mr. Hernandez states that the Department requested that the Fortinet service be configured "to override the web filtering that, by operation of the FortiGuard proprietary system, had assigned Public Citizen to a blocked subcategory." Second Hernandez Decl. ¶ 14. Mr. Hernandez does not specify which override method the Department used, but he does not suggest that the Department has chosen to stop blocking the Advocacy Organization subcategory on its internal and Wi-Fi networks.

ARGUMENT

"Voluntary discontinuance of an alleged illegal activity does not operate to remove a case from the ambit of judicial power." *Walling v. Helmerich & Payne*, 323 U.S. 37, 43 (1944). Rather,

"a defendant claiming that its voluntary compliance moots a case bears the formidable burden of showing that it is absolutely clear the allegedly wrongful behavior could not reasonably be expected to recur." *Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC)*, 528 U.S. 167, 190 (2000). Here, plaintiffs brought this case to vindicate their First Amendment rights to speak, and receive speech, on the Department's networks on a par with other similarly situated voices. In seeking to dismiss this case as moot, the Department does not concede the merits of plaintiffs' claims. Rather, it asserts that "the assignment of Public Citizen's website to a blocked category occurred by operation of the vendor's propriety system" and "has been overridden as it pertains to the Public Citizen website." ECF 19 (Mot. to Dismiss) 6. The Department's technical correction in response to plaintiffs' lawsuit is not sufficient to satisfy its "heavy burden" of demonstrating mootness. *Friends of the Earth*, 528 U.S. at 189 (internal quotation marks omitted).

As an initial matter, the Department's attempt to lay responsibility for blocking Public Citizen's website on Fortinet downplays the Department's own actions. Even assuming the accuracy of the representation that the Department did not direct Fortinet "to assign Public Citizen's website to a blocked category," Mot. to Dismiss 7, the Department acknowledges that it directed Fortinet to block the entire Adult/Mature Content category on the Department's networks, including the Advocacy Organizations subcategory. Second Hernandez Decl. ¶ 9. The Department does not contest that it may not, consistent with the First Amendment, block websites meeting Fortinet's definition of Advocacy Organizations—"organizations that campaign or lobby for a cause by building public awareness, raising support, influencing public policy, etc." Exh. A, p.1 to Joshi Decl. And the Department makes plain that it retains the right "as a customer" to direct Fortinet either to block or to allow access to that subcategory (or any subcategory). *See* Second Hernandez Decl. ¶ 9; *see also* Exh. A, p.1 to Joshi Decl. Yet the Department has declined to take

the action—directing Fortinet not to block the Advocacy Organization subcategory—that would resolve the problem both now and in the long term.

In these circumstances, the Department has not provided "enough clarity fully to assess the agency's intentions" with regard to its future policy on blocking constitutionally protected websites, including Public Citizen's website. *People for the Ethical Treatment of Animals v. U.S. Dep't of Agric.*, 918 F.3d 151, 158 (D.C. Cir. 2019). Mr. Hernandez represents that the Department "will not take any action to block access to Public Citizen's website through its internal and guest-WiFi networks." First Hernandez Decl. ¶ 6. But he does not describe any affirmative steps that the Department will take to address the causes that led to the violation. Without such a showing, the Department cannot "demonstrate that there is no reasonable expectation that the wrong will be repeated," *Payne Enterprises, Inc. v. United* States, 837 F.2d 486, 492 (D.C. Cir. 1988) (internal quotation marks omitted), because "[m]ere assurances that the challenged conduct will not recur … have never been enough to sustain the 'heavy' burden borne by defendants in invoking the mootness doctrine," *Wills v. U.S. Parole Comm'n*, 882 F. Supp. 2d 60, 71 (D.D.C. 2012). Mr. Hernandez, moreover, does not suggest he has authority to bind the Department, making the assurances given here particularly "weak." *See Payne Enterprises, Inc.*, 837 F.2d at 492 (giving little weight to affidavit from Air Force major that did "not pretend to speak for her superiors").

In describing the action taken in response to this lawsuit, Mr. Hernandez states that the Department's "service providers configured the Fortinet service to override the web filtering that, by operation of the FortiGuard proprietary system, had assigned Public Citizen to a blocked category." Second Hernandez Decl. ¶ 14. But Mr. Hernandez identifies "two different ways to override the web filtering"—manually changing the website's category and "administrative override or allow blocked override"—and fails to clarify which method the Department used. *Id*.

¶ 13. The administrative-override or allow-blocked-override method overrides the FortiGuard web filtering for only a limited period of time of no more than 1 year. Exh. B, p.4 to Joshi Decl. If the Department used this override method, nothing in Mr. Hernandez's declaration provides any basis for concluding that the Department has put in place processes and procedures to guarantee that any administrative or allow-blocked override is renewed before it expires.

A deeper problem, however, shows that a live case or controversy remains, regardless of the override method used for Public Citizen's website. Mr. Hernandez's declaration suggests that the Department has no mechanism to ensure that its use of web-filtering contractors complies with the agency's First Amendment obligation not to infringe on protected speech. The Department has not, for example, committed to unblocking the Advocacy Organization subcategory, even though the Department has no plausible constitutional basis for excluding "organizations that campaign or lobby for a cause by building public awareness, raising support, influencing public policy, etc." from the agency's networks. Exh. A, p.1 to Joshi Decl. Nor has the Department explained how it intends to avoid this constitutional problem as technologies or vendors change. The "total lack of *any* indication that the agency has taken steps" to prevent Public Citizen's website from being caught up again in whatever web filter service the Department uses, *In re Ctr. For Auto Safety*, 793 F.2d 1346, 1353 n.43 (D.C. Cir. 1986), represents a significant risk that dismissal of this lawsuit would leave the Department "free to return to [its] old ways," *id.* at 1352 (internal quotation marks omitted).

That risk is "heighten[ed]" by the Department's "refusal to admit the illegality of its past conduct." *Id.* at 1353. If the Department, without acknowledging its error, could "moot a challenge" to its website-blocking actions simply by creating an override for the party bringing the lawsuit, it "could forever avoid judicial review" of the continuing unlawful action. *Reeve Aleutian*

Airways, Inc. v. United States, 889 F.2d 1139, 1142 (D.C. Cir. 1989) (internal quotation marks omitted). So long as the Department fails to acknowledge the significant First Amendment implications of a government agency blocking the websites of "Advocacy Organizations" such as Public Citizen, "the likelihood of recurrence of challenged activity is more substantial." *Armster v. U.S. Dist. Court*, 806 F.2d 1347, 1359 (9th Cir. 1986).

Thus, in *Knight First Amendment Institute at Columbia University v. Trump*, No. 18-1691-CV, 2019 WL 2932440 (2d Cir. July 9, 2019), the Second Circuit held that the President's "[v]oluntary discontinuance of an alleged illegal activity"—blocking critics on his Twitter feed—did not moot a declaratory-judgment action challenging the original blocking under the First Amendment. *Id*. at *4 n.3 (quoting *Walling*, 323 US. at 43). Likewise here, given the Department's failure to acknowledge its First Amendment violation, as well as that the override may last one year or less, a declaratory judgment in plaintiffs' favor is needed to "ensure" that the Department does not "continue to fail to meet" its constitutional responsibilities. *Forest Guardians v. Johanns*, 450 F.3d 455, 462 (9th Cir. 2006); *see Del Monte Fresh Produce Co. v. United States*, 570 F.3d 316, 321 (D.C. Cir. 2009) (stating that "even though the specific action that the plaintiff challenges has ceased, a claim for declaratory relief will not be moot even if the plaintiff … merely attacks an isolated agency action, so long as the specific claim … falls within the voluntary cessation doctrine") (internal quotation marks, brackets, and punctuation omitted).

A declaratory judgment is particularly critical here because the Department's management of its internal and guest Wi-Fi networks will occur behind the scenes and outside of public view. For this reason, this case is unlike those on which the Department relies, where the courts could take comfort in government policymakers' formal or, at least, public rejection of the policy that had led to underlying litigation. *See Chichakli v. Trump,* 714 Fed. Appx 1, 2 (D.C. Cir. 2017)

(holding case moot in light of the elimination of regulations and removal of plaintiff from sanctions list); *National Black Police Ass'n v. Dist. of Col.*, 108 F.3d 346, 348 (D.C. Cir. 1997) (holding action moot in light of the "passage of … new legislation"); *Citizens for Responsibility & Ethics in Washington v. SEC*, 858 F. Supp. 2d 51, 56, 62 (D.D.C. 2012) (holding action moot in light of a letter sent to Congress by a high-ranking agency official). Nor is this a case where recurrence of the challenged conduct "requires [the court] to imagine a sequence of coincidences too long to credit." *People for the Ethical Treatment of Animals v. Gittens*, 396 F.3d 416, 424 (D.C. Cir. 2005). Although the Department implemented a (potentially temporary) override, the Department apparently has no plans to ensure that Public Citizen is not blocked again, for example by requesting that Fortinet allow access to the Advocacy Organization subcategory. "[A] case 'becomes moot only when it is impossible for a court to grant any effectual relief whatever to the prevailing party.'" *Chafin v. Chafin*, 568 U.S. 165, 172 (2013) (quoting *Knox v. Service Employees Intern. Union*, 567 U.S. 298, 307 (2012)). Here, however, absent a declaratory judgment by this Court, plaintiffs remain at a heightened risk that the Department will again block access to Public Citizen's website.

CONCLUSION

For the foregoing reasons, the Court should deny defendants' motion to dismiss this case as moot.

July 24, 2019

Respectfully submitted,

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UNITED STATES DISTRICT COURT
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[PROPOSED] ORDER

Upon consideration of Defendants' motion to dismiss this case as moot, the opposition thereto, and the record in this case, it is hereby ordered that the motion is DENIED.

SO ORDERED.

Dated _____, 2019   By _____
                                     RANDOLPH D. MOSS
                                     United States District Judge

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DECLARATION OF NANDAN M. JOSHI

I, Nandan M. Joshi, declare as follows:

1.   I am an attorney at Public Citizen Litigation Group and represent plaintiffs in the above-captioned case. This declaration is being made in support of plaintiffs' opposition to defendants' motion to dismiss (ECF 19).

2.   On July 22, 2019, I visited the following web address: https://fortiguard.com /webfilter/categories. Attached as Exhibit A is a true and accurate copy of the contents of that web address as of that date, except to the extent any content was lost or altered during the process of printing that website to PDF format.

3.   On   July   22,   2019,   I   visited   the   following   web   address: https://help.fortinet.com/fos50hlp/54/Content/FortiOS/fortigate-security-profiles-54/Web_Filter/ Overriding%20FortiGuard%20website%20categorization.htm. Attached as Exhibit B is a true and accurate copy of the contents of that web address as of that date, except to the extent any content was lost or altered during the process of printing that website to PDF format.

Executed on July 24, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge and belief.

/s/ Nandan M. Joshi
Nandan M. Joshi

EXHIBIT A

► Home (/) / Web Filter (/webfilter) / Categories

At a glance:

Submit a site for categorization (/faq/wfratingsubmit)

Web Filter Categories

FortiGuard URL Database Categories are based upon the Web content viewing suitability of three major groups of customers: enterprises, schools, and home/families. They also take into account customer requirements for Internet management. The categories are defined to be easily manageable and patterned to industry standards.

Each category contains websites or web pages that have been assigned based on their dominant Web content. A website or webpage is categorized into a specific category that is likely to be blocked according to its content. When a website contains elements in different categories, web pages on the site are separately categorized.

Descriptions of the categories are designed to assist the reader with category comprehension only; they are not meant to depict any form of symbolic representation of the individuals who own or surf these sites.

Adult / Mature Content

Category	Description	Tests		
Abortion	Websites pertaining to abortion data, information, legal issues, and organizations.	Web Filter (http://wfurltest.fortiguard.com/wftest/7.html)	Full SSL Inspection (https://fortiguard.com/wftest/7.html)	SSL Certificate Inspection (https://wftest7.fortiguard.com/wftest/7.html)
Advocacy Organizations	This category caters to organizations that campaign or lobby for a cause by building public awareness, raising support, influencing public policy, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/9.html)	Full SSL Inspection (https://fortiguard.com/wftest/9.html)	SSL Certificate Inspection (https://wftest9.fortiguard.com/wftest/9.html)
Alcohol	Websites which legally promote or sell alcohol products and accessories.	Web Filter (http://wfurltest.fortiguard.com/wftest/64.html)	Full SSL Inspection (https://fortiguard.com/wftest/64.html)	SSL Certificate Inspection (https://wftest64.fortiguard.com/wftest/64.html)

Category	Description	Tests		
Alternative Beliefs	Websites that provide information about or promote religions not specified in Traditional Religions or other unconventional, cultic, or folkloric beliefs and practices. Sites that promote or offer methods, means of instruction, or other resources to affect or influence real events through the use of spells, curses, magic powers, satanic or supernatural beings.	Web Filter (http://wfurltest.fortiguard.com/wftest/2.html)	Full SSL Inspection (https://fortiguard.com/wftest/2.html)	SSL Certificate Inspection (https://wftest2.fortiguard.com/wftest/2.html)
Dating	Websites that allow individuals to make contact and communicate with each other over the Internet, usually with the objective of developing a personal, romantic, or sexual relationship.	Web Filter (http://wfurltest.fortiguard.com/wftest/15.html)	Full SSL Inspection (https://fortiguard.com/wftest/15.html)	SSL Certificate Inspection (https://wftest15.fortiguard.com/wftest/15.html)
Gambling	Sites that cater to gambling activities such as betting, lotteries, casinos, including gaming information, instruction, and statistics.	Web Filter (http://wfurltest.fortiguard.com/wftest/11.html)	Full SSL Inspection (https://fortiguard.com/wftest/11.html)	SSL Certificate Inspection (https://wftest11.fortiguard.com/wftest/11.html)
Lingerie and Swimsuit	Websites that utilizes images of semi-nude models in lingerie, undergarments and swimwear for the purpose of selling or promoting such items.	Web Filter (http://wfurltest.fortiguard.com/wftest/66.html)	Full SSL Inspection (https://fortiguard.com/wftest/66.html)	SSL Certificate Inspection (https://wftest66.fortiguard.com/wftest/66.html)

Category	Description	Tests		
Marijuana	Sites that provide information about or promote the cultivation, preparation, or use of marijuana.	Web Filter (http://wfurltest.fortiguard.com/wftest/57.html)	Full SSL Inspection (https://fortiguard.com/wftest/57.html)	SSL Certificate Inspection (https://wftest57.fortiguard.com/wftest/57.html)
Nudity and Risque	Mature content websites (18+ years and over) that depict the human body in full or partial nudity without the intent to sexually arouse.	Web Filter (http://wfurltest.fortiguard.com/wftest/13.html)	Full SSL Inspection (https://fortiguard.com/wftest/13.html)	SSL Certificate Inspection (https://wftest13.fortiguard.com/wftest/13.html)
Other Adult Materials	Mature content websites (18+ years and over) that feature or promote sexuality, strip clubs, sex shops, etc. excluding sex education, without the intent to sexually arouse.	Web Filter (http://wfurltest.fortiguard.com/wftest/8.html)	Full SSL Inspection (https://fortiguard.com/wftest/8.html)	SSL Certificate Inspection (https://wftest8.fortiguard.com/wftest/8.html)
Pornography	Mature content websites (18+ years and over) which present or display sexual acts with the intent to sexually arouse and excite.	Web Filter (http://wfurltest.fortiguard.com/wftest/14.html)	Full SSL Inspection (https://fortiguard.com/wftest/14.html)	SSL Certificate Inspection (https://wftest14.fortiguard.com/wftest/14.html)
Sex Education	Educational websites that provide information or discuss sex and sexuality, without utilizing pornographic materials.	Web Filter (http://wfurltest.fortiguard.com/wftest/63.html)	Full SSL Inspection (https://fortiguard.com/wftest/63.html)	SSL Certificate Inspection (https://wftest63.fortiguard.com/wftest/63.html)
Sports Hunting and War Games	Web pages that feature sport hunting, war games, paintball facilities, etc. Includes all related clubs, organizations and groups.	Web Filter (http://wfurltest.fortiguard.com/wftest/67.html)	Full SSL Inspection (https://fortiguard.com/wftest/67.html)	SSL Certificate Inspection (https://wftest67.fortiguard.com/wftest/67.html)
Tobacco	Websites which legally promote or sell tobacco products and accessories.	Web Filter (http://wfurltest.fortiguard.com/wftest/65.html)	Full SSL Inspection (https://fortiguard.com/wftest/65.html)	SSL Certificate Inspection (https://wftest65.fortiguard.com/wftest/65.html)

Category	Description	Tests		
Weapons (Sales)	Websites that feature the legal promotion or sale of weapons such as hand guns, knives, rifles, explosives, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/16.html)	Full SSL Inspection (https://fortiguard.com/wftest/16.html)	SSL Certificate Inspection (https://wftest16.fortiguard.com/wftest/16.html)

Bandwidth Consuming

Category	Description	Tests		
File Sharing and Storage	Websites that permit users to utilize Internet servers to store personal files or for sharing, such as with photos.	Web Filter (http://wfurltest.fortiguard.com/wftest/24.html)	Full SSL Inspection (https://fortiguard.com/wftest/24.html)	SSL Certificate Inspection (https://wftest24.fortiguard.com/wftest/24.html)
Freeware and Software Downloads	Sites whose primary function is to provide freeware and software downloads. Cell phone ringtones/images/games, computer software updates for free downloads are all included in this category.	Web Filter (http://wfurltest.fortiguard.com/wftest/19.html)	Full SSL Inspection (https://fortiguard.com/wftest/19.html)	SSL Certificate Inspection (https://wftest19.fortiguard.com/wftest/19.html)
Internet Radio and TV	Websites that broadcast radio or TV communications over the Internet.	Web Filter (http://wfurltest.fortiguard.com/wftest/75.html)	Full SSL Inspection (https://fortiguard.com/wftest/75.html)	SSL Certificate Inspection (https://wftest75.fortiguard.com/wftest/75.html)
Internet Telephony	Websites that enable telephone communications over the Internet.	Web Filter (http://wfurltest.fortiguard.com/wftest/76.html)	Full SSL Inspection (https://fortiguard.com/wftest/76.html)	SSL Certificate Inspection (https://wftest76.fortiguard.com/wftest/76.html)
Peer-to-peer File Sharing	Websites that allow users to share files and data storage between each other.	Web Filter (http://wfurltest.fortiguard.com/wftest/72.html)	Full SSL Inspection (https://fortiguard.com/wftest/72.html)	SSL Certificate Inspection (https://wftest72.fortiguard.com/wftest/72.html)
Streaming Media and Download	Websites that allow the downloading of MP3 or other multimedia files.	Web Filter (http://wfurltest.fortiguard.com/wftest/25.html)	Full SSL Inspection (https://fortiguard.com/wftest/25.html)	SSL Certificate Inspection (https://wftest25.fortiguard.com/wftest/25.html)

General Interest - Business

Category	Description	Tests		
Armed Forces	Websites related to organized military and armed forces, excluding civil and extreme military organizations.	Web Filter (http://wfurltest.fortiguard.com/wftest/53.html)	Full SSL Inspection (https://fortiguard.com/wftest/53.html)	SSL Certificate Inspection (https://wftest53.fortiguard.com/wftest/53.html)

Category	Description	Tests
Business	Sites sponsored by or devoted to business firms, business associations, industry groups, or business in general. Information Technology companies are excluded in this category and fall in Information Technology.	Web Filter (http://wfurltest.fortiguard.com/wftest/49.html) Full SSL Inspection (https://fortiguard.com/wftest/49.html) SSL Certificate Inspection (https://wftest49.fortiguard.com/wftest/49.html)
Charitable Organizations	Sites for organizations that are set up with a mission that serves a public purpose, and are philanthropic in nature. This category excludes advocacy or political organizations.	Web Filter (http://wfurltest.fortiguard.com/wftest/92.html) Full SSL Inspection (https://fortiguard.com/wftest/92.html) SSL Certificate Inspection (https://wftest92.fortiguard.com/wftest/92.html)
Finance and Banking	Financial Data and Services -- Sites that offer news and quotations on stocks, bonds, and other investment vehicles, investment advice, but not online trading. Includes banks, credit unions, credit cards, and insurance. Mortgage/insurance brokers apply here as opposed to Brokerage and Trading.	Web Filter (http://wfurltest.fortiguard.com/wftest/31.html) Full SSL Inspection (https://fortiguard.com/wftest/31.html) SSL Certificate Inspection (https://wftest31.fortiguard.com/wftest/31.html)

Web Filter Categories | FortiGuard

Category	Description	Tests		
General Organizations	Sites that cater to groups, clubs or organisations of individuals with similar interests, either professional, social, humanitarian or recreational in nature. Social and Affiliation Organizations: Sites sponsored by or that support or offer information about organizations devoted chiefly to socializing or common interests other than philanthropy or professional advancement.Not to be confused with Advocacy Groups and Political Groups.	Web Filter (http://wfurltest.fortiguard.com/wftest/43.html)	Full SSL Inspection (https://fortiguard.com/wftest/43.html)	SSL Certificate Inspection (https://wftest43.fortiguard.com/wftest/43.html)
Government and Legal Organizations	Government: Sites sponsored by branches, bureaus, or agencies of any level of government, except for the armed forces, including courts, police institutions, city-level government institutions. Legal Organizations: Sites that discuss or explain laws of various government entities.	Web Filter (http://wfurltest.fortiguard.com/wftest/51.html)	Full SSL Inspection (https://fortiguard.com/wftest/51.html)	SSL Certificate Inspection (https://wftest51.fortiguard.com/wftest/51.html)
Information Technology	Information Technology peripherals and services, cell phone services, cable TV/Internet suppliers.	Web Filter (http://wfurltest.fortiguard.com/wftest/52.html)	Full SSL Inspection (https://fortiguard.com/wftest/52.html)	SSL Certificate Inspection (https://wftest52.fortiguard.com/wftest/52.html)

Category	Description	Tests		
Information and Computer Security	Sites that provide information about or free downloadable tools for computer security, but not ordinary Freeware and Software downloading.	Web Filter (http://wfurltest.fortiguard.com/wftest/50.html)	Full SSL Inspection (https://fortiguard.com/wftest/50.html)	SSL Certificate Inspection (https://wftest50.fortiguard.com/wftest/50.html)
Online Meeting	Sites that enable hosting of meetings, screen sharing and collaboration of documents across the Internet.	Web Filter (http://wfurltest.fortiguard.com/wftest/95.html)	Full SSL Inspection (https://fortiguard.com/wftest/95.html)	SSL Certificate Inspection (https://wftest95.fortiguard.com/wftest/95.html)
Remote Access	Sites that facilitate authorized access and use of computers or private networks remotely across the Internet.	Web Filter (http://wfurltest.fortiguard.com/wftest/93.html)	Full SSL Inspection (https://fortiguard.com/wftest/93.html)	SSL Certificate Inspection (https://wftest93.fortiguard.com/wftest/93.html)
Search Engines and Portals	Sites that support searching the Web, news groups, or indices/directories. Sites of search engines that provide info exclusively for shopping or comparing prices, however, fall in Shopping and Auction.	Web Filter (http://wfurltest.fortiguard.com/wftest/41.html)	Full SSL Inspection (https://fortiguard.com/wftest/41.html)	SSL Certificate Inspection (https://wftest41.fortiguard.com/wftest/41.html)
Secure Websites	Sites that institute security measures such as authentication, passwords, registration, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/81.html)	Full SSL Inspection (https://fortiguard.com/wftest/81.html)	SSL Certificate Inspection (https://wftest81.fortiguard.com/wftest/81.html)
Web Analytics	Sites that are used to collect and assess web traffic data.	Web Filter (http://wfurltest.fortiguard.com/wftest/94.html)	Full SSL Inspection (https://fortiguard.com/wftest/94.html)	SSL Certificate Inspection (https://wftest94.fortiguard.com/wftest/94.html)
Web Hosting	Sites of organizations that provide hosting services, or top-level domain pages of Web communities.	Web Filter (http://wfurltest.fortiguard.com/wftest/56.html)	Full SSL Inspection (https://fortiguard.com/wftest/56.html)	SSL Certificate Inspection (https://wftest56.fortiguard.com/wftest/56.html)

Category	Description	Tests		
Web-based Applications	Sites that mimic desktop applications such as word processing, spreadsheets, and slide-show presentations.	Web Filter (http://wfurltest.fortiguard.com/wftest/84.html)	Full SSL Inspection (https://fortiguard.com/wftest/84.html)	SSL Certificate Inspection (https://wftest84.fortiguard.com/wftest/84.html)

General Interest - Personal

Category	Description	Tests		
Advertising	Sites that provide advertising graphics or other ad content files, including ad servers (domain name often with 'ad.', such as ad.yahoo.com). If a site is mainly for online transactions, it is rated as Shopping and Auctions. Includes pay-to-surf and affiliated advertising programs.	Web Filter (http://wfurltest.fortiguard.com/wftest/17.html)	Full SSL Inspection (https://fortiguard.com/wftest/17.html)	SSL Certificate Inspection (https://wftest17.fortiguard.com/wftest/17.html)
Arts and Culture	Websites that cater to fine arts, cultural behaviors and backgrounds including conventions, artwork and paintings, music, languages, customs, etc. Also includes institutions such as museums, libraries and historic sites. Sites that promote historical, cultural heritage of certain area, but not purposely promoting travel.	Web Filter (http://wfurltest.fortiguard.com/wftest/29.html)	Full SSL Inspection (https://fortiguard.com/wftest/29.html)	SSL Certificate Inspection (https://wftest29.fortiguard.com/wftest/29.html)

Category	Description	Tests		
Auction	Websites that feature on-line promotion or sale of general goods and services such as electronics, flowers, jewelry, music, etc, excluding real estate. Also includes on-line auction services such as eBay, Amazon, Priceline.	Web Filter (http://wfurltest.fortiguard.com/wftest/89.html)	Full SSL Inspection (https://fortiguard.com/wftest/89.html)	SSL Certificate Inspection (https://wftest89.fortiguard.com/wftest/89.html)
Brokerage and Trading	Sites that support active trading of securities and management of investments. Real estate broker does not apply here, and falls within Shopping and Auction. Sites that provide supplier and buyer info/ads do not apply here either since they do not provide trading activities.	Web Filter (http://wfurltest.fortiguard.com/wftest/18.html)	Full SSL Inspection (https://fortiguard.com/wftest/18.html)	SSL Certificate Inspection (https://wftest18.fortiguard.com/wftest/18.html)
Child Education	Websites developed for children age 12 and under. Includes educational games, tools, organizations and schools. Note that children's hospitals are rated as Health.	Web Filter (http://wfurltest.fortiguard.com/wftest/77.html)	Full SSL Inspection (https://fortiguard.com/wftest/77.html)	SSL Certificate Inspection (https://wftest77.fortiguard.com/wftest/77.html)
Content Servers	Websites that host servers that distribute content for subscribing websites. Includes image and Web servers.	Web Filter (http://wfurltest.fortiguard.com/wftest/82.html)	Full SSL Inspection (https://fortiguard.com/wftest/82.html)	SSL Certificate Inspection (https://wftest82.fortiguard.com/wftest/82.html)
Digital Postcards	Sites for sending/viewing digital post cards.	Web Filter (http://wfurltest.fortiguard.com/wftest/71.html)	Full SSL Inspection (https://fortiguard.com/wftest/71.html)	SSL Certificate Inspection (https://wftest71.fortiguard.com/wftest/71.html)

Category	Description	Tests		
Domain Parking	Sites that simply are place holders of domains without meaningful content.	Web Filter (http://wfurltest.fortiguard.com/wftest/85.html)	Full SSL Inspection (https://fortiguard.com/wftest/85.html)	SSL Certificate Inspection (https://wftest85.fortiguard.com/wftest/85.html)
Dynamic Content	URLs that are generated dynamically by a Web server.	Web Filter (http://wfurltest.fortiguard.com/wftest/54.html)	Full SSL Inspection (https://fortiguard.com/wftest/54.html)	SSL Certificate Inspection (https://wftest54.fortiguard.com/wftest/54.html)
Education	Educational Institutions: Sites sponsored by schools, other educational facilities and non-academic research institutions, and sites that relate to educational events and activities. Educational Materials: Sites that provide information about, sell, or provide curriculum materials. Sites that direct instruction, as well as academic journals and similar publications where scholars and professors submit academic/research articles.	Web Filter (http://wfurltest.fortiguard.com/wftest/30.html)	Full SSL Inspection (https://fortiguard.com/wftest/30.html)	SSL Certificate Inspection (https://wftest30.fortiguard.com/wftest/30.html)

Category	Description	Tests		
Entertainment	Sites that provide information about or promote motion pictures, non-news radio and television, music and programming guides, books, humor, comics, movie theatres, galleries, artists or review on entertainment, and magazines. Includes book sites that have personal flavor or extra-material by authors to promote the books.	Web Filter (http://wfurltest.fortiguard.com/wftest/28.html)	Full SSL Inspection (https://fortiguard.com/wftest/28.html)	SSL Certificate Inspection (https://wftest28.fortiguard.com/wftest/28.html)
Folklore	UFOs, fortune telling, horoscopes, fen shui, palm reading, tarot reading, and ghost stories.	Web Filter (http://wfurltest.fortiguard.com/wftest/58.html)	Full SSL Inspection (https://fortiguard.com/wftest/58.html)	SSL Certificate Inspection (https://wftest58.fortiguard.com/wftest/58.html)
Games	Sites that provide information about or promote electronic games, video games, computer games, role-playing games, or online games. Includes sweepstakes and giveaways. Sport games are not included in this category, but time consuming mathematic game sites that serve little education purpose are included in this category.	Web Filter (http://wfurltest.fortiguard.com/wftest/20.html)	Full SSL Inspection (https://fortiguard.com/wftest/20.html)	SSL Certificate Inspection (https://wftest20.fortiguard.com/wftest/20.html)

Category	Description	Tests		
Global Religion	Sites that provide information about or promote Buddhism, Bahai, Christianity, Christian Science, Hinduism, Islam, Judaism, Mormonism, Shinto, and Sikhism, as well as atheism.	Web Filter (http://wfurltest.fortiguard.com/wftest/40.html)	Full SSL Inspection (https://fortiguard.com/wftest/40.html)	SSL Certificate Inspection (https://wftest40.fortiguard.com/wftest/40.html)
Health and Wellness	Sites that provide information or advice on personal health or medical services, procedures, or devices, but not drugs. Includes self-help groups. This category includes cosmetic surgery providers, children's hospitals, but not sites of medical care for pets, which fall in Society and Lifestyle.	Web Filter (http://wfurltest.fortiguard.com/wftest/33.html)	Full SSL Inspection (https://fortiguard.com/wftest/33.html)	SSL Certificate Inspection (https://wftest33.fortiguard.com/wftest/33.html)
Instant Messaging	Sites that allow users to communicate in real-time over the Internet.	Web Filter (http://wfurltest.fortiguard.com/wftest/69.html)	Full SSL Inspection (https://fortiguard.com/wftest/69.html)	SSL Certificate Inspection (https://wftest69.fortiguard.com/wftest/69.html)
Job Search	Sites that offer information about or support the seeking of employment or employees. Includes career agents and consulting services that provide job postings.	Web Filter (http://wfurltest.fortiguard.com/wftest/34.html)	Full SSL Inspection (https://fortiguard.com/wftest/34.html)	SSL Certificate Inspection (https://wftest34.fortiguard.com/wftest/34.html)
Meaningless Content	This category houses URLs that cannot be definitively categorized due to lack of or ambiguous content.	Web Filter (http://wfurltest.fortiguard.com/wftest/55.html)	Full SSL Inspection (https://fortiguard.com/wftest/55.html)	SSL Certificate Inspection (https://wftest55.fortiguard.com/wftest/55.html)

Category	Description	Tests		
Medicine	Prescribed Medications: Sites that provide information about approved drugs and their medical use. Supplements and Unregulated Compounds: Sites that provide information about or promote the sale or use of chemicals not regulated by the FDA (such as naturally occurring compounds). This category includes sites of online shopping for medicine, as it is a sensitive category separated from regular shopping.	Web Filter (http://wfurltest.fortiguard.com/wftest/35.html)	Full SSL Inspection (https://fortiguard.com/wftest/35.html)	SSL Certificate Inspection (https://wftest35.fortiguard.com/wftest/35.html)
News and Media	Sites that offer current news and opinion, including those sponsored by newspapers, general-circulation magazines, or other media. This category includes TV and Radio sites, as long as they are not exclusively for entertainment purpose, but excludes academic journals. Alternative Journals: Online equivalents to supermarket tabloids and other fringe publications.	Web Filter (http://wfurltest.fortiguard.com/wftest/36.html)	Full SSL Inspection (https://fortiguard.com/wftest/36.html)	SSL Certificate Inspection (https://wftest36.fortiguard.com/wftest/36.html)
Newsgroups and Message Boards	Sites for online personal and business clubs, discussion groups, message boards, and list servers; includes 'blogs' and 'mail magazines.'	Web Filter (http://wfurltest.fortiguard.com/wftest/70.html)	Full SSL Inspection (https://fortiguard.com/wftest/70.html)	SSL Certificate Inspection (https://wftest70.fortiguard.com/wftest/70.html)

Category	Description	Tests		
Personal Privacy	Sites providing online banking, trading, health care, and others that contain personal privacy information.	Web Filter (http://wfurltest.fortiguard.com/wftest/87.html)	Full SSL Inspection (https://fortiguard.com/wftest/87.html)	SSL Certificate Inspection (https://wftest87.fortiguard.com/wftest/87.html)
Personal Vehicles	Websites that contain information on private use or sale of autos, boats, planes, motorcycles, etc., including parts and accessories.	Web Filter (http://wfurltest.fortiguard.com/wftest/48.html)	Full SSL Inspection (https://fortiguard.com/wftest/48.html)	SSL Certificate Inspection (https://wftest48.fortiguard.com/wftest/48.html)
Personal Websites and Blogs	Private web pages that host personal information, opinions and ideas of the owners.	Web Filter (http://wfurltest.fortiguard.com/wftest/80.html)	Full SSL Inspection (https://fortiguard.com/wftest/80.html)	SSL Certificate Inspection (https://wftest80.fortiguard.com/wftest/80.html)
Political Organizations	Sites that are sponsored by or provide information about political parties and interest groups focused on elections or legislation. This is not to be confused with Government and Legal Organizations, and Advocacy Groups.	Web Filter (http://wfurltest.fortiguard.com/wftest/38.html)	Full SSL Inspection (https://fortiguard.com/wftest/38.html)	SSL Certificate Inspection (https://wftest38.fortiguard.com/wftest/38.html)
Real Estate	Websites that promote the sale or renting of real estate properties.	Web Filter (http://wfurltest.fortiguard.com/wftest/78.html)	Full SSL Inspection (https://fortiguard.com/wftest/78.html)	SSL Certificate Inspection (https://wftest78.fortiguard.com/wftest/78.html)
Reference	Websites that provide general reference data in the form of libraries, dictionaries, thesauri, encyclopedias, maps, directories, standards, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/39.html)	Full SSL Inspection (https://fortiguard.com/wftest/39.html)	SSL Certificate Inspection (https://wftest39.fortiguard.com/wftest/39.html)

Category	Description	Tests		
Restaurant and Dining	Websites related to restaurants and dining, includes locations, food reviews, recipes, catering services, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/79.html)	Full SSL Inspection (https://fortiguard.com/wftest/79.html)	SSL Certificate Inspection (https://wftest79.fortiguard.com/wftest/79.html)
Shopping	Websites that feature on-line promotion or sale of general goods and services such as electronics, flowers, jewelry, music, etc, excluding real estate. Also includes on-line auction services such as eBay, Amazon, Priceline.	Web Filter (http://wfurltest.fortiguard.com/wftest/42.html)	Full SSL Inspection (https://fortiguard.com/wftest/42.html)	SSL Certificate Inspection (https://wftest42.fortiguard.com/wftest/42.html)
Social Networking	A social networking site is a platform to build social networks or social relations among people who share similar interests, activities, backgrounds or real-life connections. A social network service consists of a representation of each user (often a profile), his or her social links, and a variety of additional services. Social network sites are web-based services that allow individuals to create a public profile, create a list of users with whom to share connections, and view and cross the connections within the system.	Web Filter (http://wfurltest.fortiguard.com/wftest/37.html)	Full SSL Inspection (https://fortiguard.com/wftest/37.html)	SSL Certificate Inspection (https://wftest37.fortiguard.com/wftest/37.html)

Category	Description	Tests		
Society and Lifestyles	This category contains sites that deal with everyday life issues and preferences such as passive hobbies (gardening, stamp collecting, pets), journals, blogs, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/44.html)	Full SSL Inspection (https://fortiguard.com/wftest/44.html)	SSL Certificate Inspection (https://wftest44.fortiguard.com/wftest/44.html)
Sports	Includes sites that pertain to recreational sports and active hobbies such as fishing, hunting, jogging, canoeing, archery, chess, as well as organized, professional and competitive sports.	Web Filter (http://wfurltest.fortiguard.com/wftest/46.html)	Full SSL Inspection (https://fortiguard.com/wftest/46.html)	SSL Certificate Inspection (https://wftest46.fortiguard.com/wftest/46.html)
Travel	Websites in this category feature travel related resources such as accommodations, transportation (rail, airlines, cruise ships), agencies, resort locations, tourist attractions, advisories, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/47.html)	Full SSL Inspection (https://fortiguard.com/wftest/47.html)	SSL Certificate Inspection (https://wftest47.fortiguard.com/wftest/47.html)
Web Chat	Sites that host Web chat services, or that support or provide information about chat via HTTP or IRC.	Web Filter (http://wfurltest.fortiguard.com/wftest/68.html)	Full SSL Inspection (https://fortiguard.com/wftest/68.html)	SSL Certificate Inspection (https://wftest68.fortiguard.com/wftest/68.html)
Web-based Email	Sites that allow users to utilize electronic mail services.	Web Filter (http://wfurltest.fortiguard.com/wftest/23.html)	Full SSL Inspection (https://fortiguard.com/wftest/23.html)	SSL Certificate Inspection (https://wftest23.fortiguard.com/wftest/23.html)

Potentially Liable

Category	Description	Tests

Category	Description	Tests		
Child Abuse	Websites that have been verified by the Internet Watch Foundation to contain or distribute images of non-adult children that are depicted in a state of abuse. Information on the Internet Watch Foundation is available at http://www.iwf.org.uk/.	Web Filter (http://wfurltest.fortiguard.com/wftest/83.html)	Full SSL Inspection (https://fortiguard.com/wftest/83.html)	SSL Certificate Inspection (https://wftest83.fortiguard.com/wftest/83.html)
Discrimination	Sites that promote the identification of racial groups, the denigration or subjection of groups, or the superiority of any group.	Web Filter (http://wfurltest.fortiguard.com/wftest/5.html)	Full SSL Inspection (https://fortiguard.com/wftest/5.html)	SSL Certificate Inspection (https://wftest5.fortiguard.com/wftest/5.html)
Drug Abuse	Websites that feature information on illegal drug activities including: drug promotion, preparation, cultivation, trafficking, distribution, solicitation, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/1.html)	Full SSL Inspection (https://fortiguard.com/wftest/1.html)	SSL Certificate Inspection (https://wftest1.fortiguard.com/wftest/1.html)
Explicit Violence	This category includes sites that depict offensive material on brutality, death, cruelty, acts of abuse, mutilation, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/6.html)	Full SSL Inspection (https://fortiguard.com/wftest/6.html)	SSL Certificate Inspection (https://wftest6.fortiguard.com/wftest/6.html)
Extremist Groups	Sites that feature radical militia groups or movements with aggressive anti-government convictions or beliefs.	Web Filter (http://wfurltest.fortiguard.com/wftest/12.html)	Full SSL Inspection (https://fortiguard.com/wftest/12.html)	SSL Certificate Inspection (https://wftest12.fortiguard.com/wftest/12.html)
Hacking	Websites that depict illicit activities surrounding the unauthorized modification or access to programs, computers, equipment and websites.	Web Filter (http://wfurltest.fortiguard.com/wftest/3.html)	Full SSL Inspection (https://fortiguard.com/wftest/3.html)	SSL Certificate Inspection (https://wftest3.fortiguard.com/wftest/3.html)

Web Filter Categories | FortiGuard

Category	Description	Tests		
Illegal or Unethical	Websites that feature information, methods, or instructions on fraudulent actions or unlawful conduct (non-violent) such as scams, counterfeiting, tax evasion, petty theft, blackmail, etc.	Web Filter (http://wfurltest.fortiguard.com/wftest/4.html)	Full SSL Inspection (https://fortiguard.com/wftest/4.html)	SSL Certificate Inspection (https://wftest4.fortiguard.com/wftest/4.html)
Plagiarism	Websites that provide, distribute or sell school essays, projects, or diplomas.	Web Filter (http://wfurltest.fortiguard.com/wftest/62.html)	Full SSL Inspection (https://fortiguard.com/wftest/62.html)	SSL Certificate Inspection (https://wftest62.fortiguard.com/wftest/62.html)
Proxy Avoidance	Websites that provide information or tools on how to bypass Internet access controls and browse the Web anonymously, includes anonymous proxy servers.	Web Filter (http://wfurltest.fortiguard.com/wftest/59.html)	Full SSL Inspection (https://fortiguard.com/wftest/59.html)	SSL Certificate Inspection (https://wftest59.fortiguard.com/wftest/59.html)

Security Risk

Category	Description	Tests		
Dynamic DNS	Sites that utilize dynamic DNS services to map a Fully Qualified Domain Name (FQDN) to a specific IP address or set of addresses under the control of the site owner; these are often used in cyber attacks and botnet command & control servers.	Web Filter (http://wfurltest.fortiguard.com/wftest/88.html)	Full SSL Inspection (https://fortiguard.com/wftest/88.html)	SSL Certificate Inspection (https://wftest88.fortiguard.com/wftest/88.html)
Malicious Websites	Sites that host software that is covertly downloaded to a user's machine to collect information and monitor user activity, and sites that are infected with destructive or malicious software, specifically designed to damage, disrupt, attack or manipulate computer systems without the user's consent, such as virus or trojan horse.	Web Filter (http://wfurltest.fortiguard.com/wftest/26.html)	Full SSL Inspection (https://fortiguard.com/wftest/26.html)	SSL Certificate Inspection (https://wftest26.fortiguard.com/wftest/26.html)

Category	Description	Tests		
Newly Observed Domain	Domains that are newly configured or newly active, but not necessarily newly registered.			
Newly Registered Domain	Domains that were very recently registered.	Web Filter (http://wfurltest.fortiguard.com/wftest/91.html)	Full SSL Inspection (https://fortiguard.com/wftest/91.html)	SSL Certificate Inspection (https://wftest91.fortiguard.com/wftest/91.html)
Phishing	Counterfeit web pages that duplicate legitimate business web pages for the purpose of eliciting financial, personal or other private information from the users.	Web Filter (http://wfurltest.fortiguard.com/wftest/61.html)	Full SSL Inspection (https://fortiguard.com/wftest/61.html)	SSL Certificate Inspection (https://wftest61.fortiguard.com/wftest/61.html)
Spam URLs	Websites or webpages whose URLs are found in spam emails. These webpages often advertise sex sites, fraudulent wares, and other potentially offensive materials.	Web Filter (http://wfurltest.fortiguard.com/wftest/86.html)	Full SSL Inspection (https://fortiguard.com/wftest/86.html)	SSL Certificate Inspection (https://wftest86.fortiguard.com/wftest/86.html)

Unrated

Category	Description	Tests
Not Rated	Sites not yet analyzed/categorized are considered unrated.	

- - (https://www.facebook.com/FortiGuard.Labs)
  - (https://plus.google.com/+fortinet)
  - (https://twitter.com/FortiGuardLabs)
  - (https://www.linkedin.com/showcase/3668640/)
  - (/rss-feeds)

- - Contact Us (/contactus)
  - Legal (https://www.fortinet.com/corporate/about-us/legal.html)
  - Privacy (https://www.fortinet.com/corporate/about-us/privacy.html)
  - FAQ (/faq)
  - Partners (/partners)
  - Feedback (/faq/generalcontact)

-

EXHIBIT B

Search 🔍
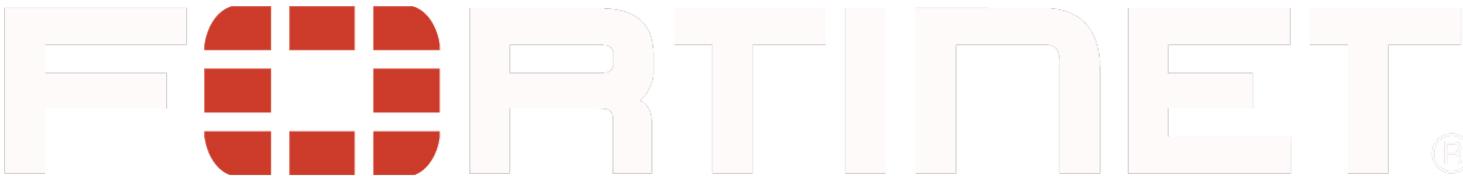
> Chapter 26 - Security Profiles > Web filter > Overriding FortiGuard website categorization

Overriding FortiGuard website categorization

In most things there is an exception to the rule. When it comes to the rules about who is allowed to go to which websites in spite of the rules or in this case, policies, it seems that there are more exceptions than to most rules. There are numerous valid reasons and scenarios for exceptions so it follows that there needs to be a way to accommodate this exception.

The different methods of override

There are actually two different ways to override web filtering behavior based on FortiGuard categorization of a websites. The second method has two variations in implementation and each of the three has a different level of granularity.

1. Using Alternate Categories

   Web Rating Overrides

   This method manually assigns a specific website to a different Fortinet category or a locally created category.

2. Using Alternate Profiles

   Administrative Override or Allow Blocked Override

   In this method all of the traffic going through the FortiGate unit, using identity based policies and a Web Filtering profile has the option where configured users or IP addresses can use an alternative Web Filter profile when attempting to access blocked websites.

Using Alternate Categories

Web Rating Overrides

There are two approaches to overriding the FortiGuard Web Filtering. The first is an identity-based method that can be configured using a combination of identity-based policies and specifically designed webfilter profiles. This is addressed in the Firewall Handbook.

The second method is the system-wide approach that locally (on the FortiGate Firewall) reassigns a URL to a different FortiGuard Category or even subcategory. This is where you can assign a specific URL to the FortiGuard Category that you want to you can also set the URL to one of the Custom Categories that you have created

The Web Rating Overrides option is available because different people will have different criteria for how they categorize websites. Even if the criteria is the same an organization may have reason to block the bulk of a category but need to be able to access specific URLs that are assigned to that category.

A hypothetical example could be that a website, example.com is categorized as being in the Sub-Category Pornography. The law offices of Barrister, Solicitor, and Lawyer do not want their employees looking at pornography at work so they have used the FortiGuard Webfilter to block access to sites that have been assigned to the Category "Pornography". However, the owners of example.com are clients of the law office and they are aware that example.com is for artists that specialize in nudes and erotic images. In this case two approaches can be taken. The first is that the Web Rating Override function can be used to assign

example.com to Nudity and Risque instead of Pornography for the purposes of matching the criteria that the law office goes by or the site can be assigned to a Custom Category that is not blocked because the site belongs to one of their clients and they always want to be able to access the site.

Another hypothetical example from the other side of the coin. A private school has decided that a company that specializes in the online selling of books that could be considered inappropriate for children because of their violent subject matter, should not be accessible to anyone in the school. The categorization by Fortinet of the site example2.com is General Interest - Business with the subcategory of Shopping and Auction, which is a category that is allowed at the school. In this case they school could reassign the site to the Category Adult Material which is a blocked category.

Local or Custom Categories

User-defined categories can be created to allow users to block groups of URLs on a per-profile basis. The categories defined here appear in the global URL category list when configuring a web filter profile. Users can rate URLs based on the local categories.

Users can create user-defined categories then specify the URLs that belong to the category. This allows users to block groups of web sites on a per profile basis. The ratings are included in the global URL list with associated categories and compared in the same way the URL block list is processed.

Local categories and local rating features consume a large amount of CPU resources; use these features as little as possible.

The local assignment of a category overrides the FortiGuard server ratings and appear in reports as "Local" Categories or "Custom" Categories depending on the context.

CLI commands

In the CLI, the term is Local Categories.

To create a Local Category:

```
config webfilter ftgd-local-cat
   edit local_category_1
       set id 140
   end
```

To set a rating to a Local Category:

```
config webfilter ftgd-local-rating
   edit <url_str>
       set rating {[<category_int>] [group_str] . . .]
       set status {enable | disable}
   end
```

GUI commands

In the GUI you will see Local Categories on the Edit Web Filter profile page and Custom Categories on the Web Rating Overrides page. Both these pages will be used to create local categories and to apply actions to them.

Creating a Local or Custom Category

1. Go to **Security Profiles > Web Rating Overrides**.

2. Select **Custom Categories** in the top menu bar.
3. In the new window, click on **Create New**.
4. A new row will appear at the bottom of the list of categories with a field on the left highlighted and the message **This field is required**. Enter the name of the custom category in this field.
5. Select **Enter**.

Configuring Web Rating Overrides

1. Go to **Security Profiles > Web Rating Overrides.**
2. Select **Create New**
3. Type in the **URL** field the URL of the Website that you wish to recategorize. Do not use wildcard expressions when typing in the URL.
4. Select the **Lookup Rating** button to verify the current categorization that is being assigned to the URL.
5. Change the **Category** field to one of the more applicable options from the drop down menu, for example, one of the custom categories just created.
6. Change the **Sub-Category** field to a more narrowly defined option within the main category.
7. Select **OK**.

It is usually recommended that you choose a category that you know will be addressed in existing Web Filter profiles so that you will not need to engage in further configuration.

Applying an Action to a Local or Custom Category

1. Go to **Security Profiles > Web Filter**.
2. Expand the **Local Categories** icon in the top menu bar.
3. Right-click on a category from the list and set the action to **Allow**, **Block**, **Monitor**, **Warning**, **Authenticate**, or **Disable**.
4. Select **Apply**.

Local Category scenarios

Scenario 1: The configuration of the domain name overrides the configuration for the subdirectory.

Depending on the URL specified or other aspects of configuration, the configuration of a local

or custom category may not take effect. Consider a scenario where you have defined:

- example.com – local rating as "category 1", action set to Block
- example.com/subdirectory – local rating as "category 2", action set to Monitor
- example.com/subdirectory/page.html – local rating as "category 3", action set to Warning.

If a user browses to "example.com", access will be blocked. If a user browses to example.com/subdirectory, access will also be blocked,even though that address was configured to be part of category2. The configuration of the domain name overrides the configuration for the subdirectory.

However, if you configure a specific HTML page differently than the domain name, then that configuration will apply. In this scenario, the user will see a Warning message but will be able to pass through to the page.

Scenario 2: User-defined local ratings and SNI matches

In this scenario, local categories are defined and sites are added to those categories.

- There is no behavioral difference if the hostname is sent from from ClientHello SNI or from HTTP request-url.
- The SNI will be used as hostname for https certificate-inspection or ssl-exempt.
- If a valid SNI exist, then SNI will be used as the domain name for url rating instead of CN inthe server certificate.
- For the local rating, "example.com" will match "test.example.com", but will not match "another_example.com".

Using Alternate Profiles

Allow Blocked Overrides or Web Overrides

The Administrative Override feature for Web Filtering was added and is found by going to **Security Profiles > Web Filter** and then enabling Allow Blocked Override. This opening window will display a listing of all of the overrides of this type. The editing window referred to the configuration as an Administrative Override.

The Concept

When a Web filter profile is overridden, it does not necessarily remove all control and restrictions that were previously imposed by the Web Filter. The idea is to replace a restrictive filter with a different one. In practice, it makes sense that this will likely be a profile that is less restrictive the original one but there is nothing that forces this. The degree to which the alternate profile is less restrictive is open. It can be as much as letting the user access everything on the Internet or as little as allowing only one addition website. The usual practice is to have as few alternate profiles as are needed to allow approved people to access what they need during periods when an exception to the normal rules is needed but still having enough control that the organizations web usage policies are not compromised.

You are not restricted to having only one alternative profile as an option to the existing profile. The new profile depends on the credentials or IP address making the connection. For example, John connecting through the "Standard" profile could get the "Allow_Streaming_Video" profile while George would get the "Allow_Social_Networking_Sites" profile.

The other thing to take into account is the time factor on these overrides. They are not indefinite. The longest that an override can be enabled is for 1 year less a minute. Often these overrides are set up for short periods of time for specific reasons such as a project. Having the time limitation means that the System Administrator does not have to remember to go back and turn the feature off after the project is finished.

Identity or Address

In either case, these override features -- for specified users, user groups or IP addresses -- allow sites blocked by Web Filtering profiles to be overridden for a specified length of time. The drawback of this method of override is that it takes more planning and preparation than the rating override method. The advantage is that once this has been set up, this method requires very little in the way of administrative overhead to maintain.

When planning to use the alternative profile approach keep in mind the following: In Boolean terms, one of the following "AND" conditions has to be met before overriding the Web Filter is possible.

Based on the IP address:

- The Web Filter profile must be specified as allowing overrides
- AND the user's computer is one of the IP addresses specified
- AND the time is within the expiration time frame.

While the conditions are fewer for this situation, there is less control over who has the ability to bypass the filtering configured for the site. All someone has to do is get on a computer that is allowed to override the Web Filter and they have access.

Based on user group:

- The Web Filter profile must be specified as allowing overrides
- AND the policy the traffic is going through must be identity based
- AND the user's credentials matches the identity credentials specified
- AND the time is within the expiration time frame.

This method is the one most likely to be used as it gives more control in that the user has to have the correct credential and is more versatile because the user can use the feature from any computer that uses the correct policy to get out on the Internet.

Settings

When using an alternate profile approach to Web Filter overrides, the following settings are used to determine authentication and outcome. Not every setting is used in both methods but enough of them are common to describe them collectively.

Apply to Group(s)

This is found in the Allow Blocked Overrides configuration. Individual users can not be selected. You can select one or more of the User Groups that are recognized my the FortiGate unit, whether they are local to the system or from a third part authentication device such as a AD server through FSSO.

Original Profile

This is found in the Administrative Override configuration. In the Allow Blocked Overrides setting the configuration is right inside the profile so there is no need to specify which profile is the original one, but the Administrative Override setup is done separately from the profiles themselves.

Assign to Profile or New Profile

Despite the difference in the name of the field, this is the same thing in both variations of the feature. You select from the drop down menu the alternate Web Filter Profile that you wish to set up for this override.

Scope or Scope Range

When setting up the override in the "Allow Blocked Overrides" variation, you are given a drop-down menu next to the field name Scope while in the Administrative Override configuration you are asked to select a radio button next to the same options. In both cases this is just a way of selecting which form of credentials will be required to approve the overriding of the existing Web Filter profile.

When the Web Filter Block Override message page appears it will display a field named "Scope:" and depending on the selection, it will show the type of credentials used to determine whether or not the override is allowed. The available options are:

- **User**
  This means that the authentication for permission to override will be based on whether or not the user is using a specific user account.

- **User Group**
  This means that the authentication for permission to override will be based on whether on not the user account supplied as a credential is a member of the specified User Group.

- **IP**
  This means that the authentication for permission to override will be based on the IP address of the computer that was used to authenticate. This would be used with computers that have multiple users. Example: If Paul logs on to the computer, engages the override using his credentials and then logs off, if the scope was based on the IP address of the computer, anybody logging in with any account on that computer would now be using the alternate override Web Filter profile.

  When entering an IP address in the Administrative Override version, only individual IP addresses are allowed.

  Differences between IP and Identity based scope

  - Using the IP scope does not require the use of an Identity based policy.
  - When using the Administrative Override variation and IP scope, you may not see a warning message when you change from using the original Web Filter profile to using the alternate profile. There is no requirement for credentials from the user so, if allowed, the page will just come up in the browser.

- **Ask**
  This option is available only in the "Allowed Blocked Overrides" variation and when used configures the message page to ask which scope the user wished to use. Normally, when the page appears the scope options are greyed out and not editable, but by using the ask option the option is dark and the user can choose from the choice of:
  - User
  - User Group
  - IP Address

- **Duration Mode**
  This option is available only in the "Allowed Blocked Overrides" variation. The Administrative Override sets a specified time frame that is always used for that override. The available options from the drop down menu are:

  - **Constant**
    Using this setting will mean that what ever is set as the duration will be the length of time that the override will be in effect. If the Duration variable is set to 15 minutes the length of the override will always be 15 minutes. The option will be visible in the Override message page but the setting will be greyed out.

  - **Ask**

    Using this setting will give the person the option of setting the duration to the override when it is engaged. The duration time which is greyed out if the Constant setting is used will be dark and editable. The user can set the duration in terms of Day, Hours and or Minutes.

- **Duration**
  Duration is on of the areas where the two variations takes a different approach, on two aspects of the setting. As already indicated the "Administrative Override" only uses a static time frame there is no option for the user to select on the fly how long it will last. The other way in which the two variation differ is that the "Allow Blocked Overrides" starts the clock when the user logs in with his credentials. For example, if the duration is 1 hour and John initiates an override at 2:00 p.m. on January 1, at the end of that hour he will revert back to using the original profile but he can go back and re-authenticate and start the process over again. The Administrative override variation starts the clock from when the override was configured, which is why is shows an expiration date and time when your are configuring it.

This option, which is available when the Duration Mode is set to Constant is the time in minutes that the override will last when engaged by the user.

When setting up a constant duration in the Web Based Interface, minutes is the only option for units of time. To set a longer time frame or to use the units of hours or days you can use the CLI.

```
config webfilter profile
    edit <name of webfilter profile>
        config override
            set ovrd-dur <###d##h##m>
        end
```

When configuring the duration you don't have to set a value for a unit you are not using. If you are not using days or hours you can use:

```
set ovrd-dur 30m
```

instead of:

```
set ovrd-dur 0d0h30m
```

However, each of the units of time variable has their own maximum level:

```
###d cannot be more than 364
##h cannot be more than 23
##m cannot be more than 59
```

So the maximum length that the override duration can be set to is 364 days, 23 hours, and 59 minutes(a minute shy of 1 year) .

Using cookies to authenticate users in a Web Filter override

Cookies can be used to authenticate users when a web filter override is used. This feature is available in CLI only.

CLI Syntax:

```
config webfilter cookie-ovrd
    set redir-host <name or IP>
    set redir-port <port>
end

config webfilter profile
    edit <name>
        config override
            set ovrd-cookie [allow | deny]
            set ovrd-scope [user | user-group | ip | ask]
            set profile-type [list | radius]
            set ovrd-dur-mode [constant | ask]
```

```
            set ovrd-dur <duration>
            set ovrd-user-group <name>
            set profile <name>
        end
    end
end
```